CPSC ITDS/RAM Pilot System: PGA Message Set

Electronic Certificate Filing Test

March 27, 2015

This presentation has not been reviewed or approved by the Commission and may not reflect its views

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

CPSC Background

O Independent federal agency created in 1973

O Comprised of the Chairman and 4 Commissioners

O Approximately 567 staff

O 2015 budget ~$123M

What is a Certificate?

O A certification that a consumer product or other substance regulated by the Commission:

   O Has been tested:
     O *Non-children's products* – a test of each product or a reasonable testing program
     O *Children's products* – testing conducted by a third party conformity assessment body (laboratory)

   O Complies with all applicable safety rules, bans, standards, and regulations.

Required Certificate Types

Children's Product Certificate (CPC)

- Products intended primarily for children 12 years of age and younger
- Based on testing conducted by a CPSC-accepted third party laboratory (14(a)(2) of the CPSA)
- Requires periodic and material change testing
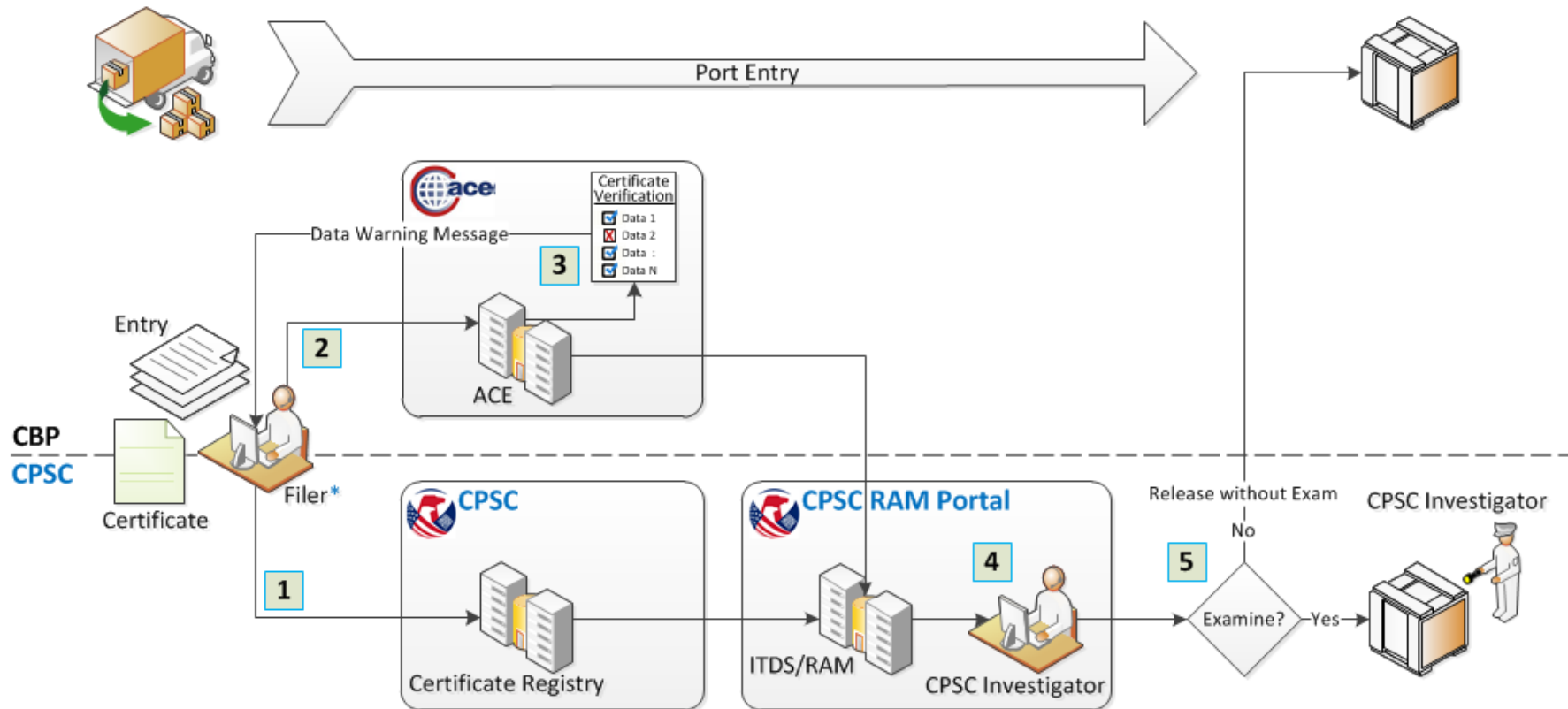- Must comply with 16 C.F.R. part 1110

General Conformity Certificate (GCC)

- Non-children's products only
- Based on a test of each product or a reasonable testing program (14(a)(1) of the CPSA)
- Must comply with 16 C.F.R. part 1110

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Why Electronic Filing?

O Expedite clearance

O Identify high risk cargo for inspection

O Conduct post-importation enforcement

O Generate reports to assist with:

  O Risk assessment

  O Setting agency enforcement priorities and goals

O Meet objectives of EO 13659, Streamlining the Export/Import Process for America's Businesses.

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Alpha Pilot: Entry Data and Certificate Flow

1. If using the Certificate Registry, the importer inputs certificate information directly into the Certificate Registry to be referenced on subsequent Entry filings

2. Entry Data is filed in ACE along with full certificate data using the PGA Message Set OR entry data is filed in ACE along with a partial PGA Message Set record that references data already filed in the Certificate Registry

3. Data is uploaded to ACE and is assessed for data quality and completeness; a notification (Data Warning Message) is sent back to filer if necessary

4. Entry Data specific to CPSC jurisdiction is reviewed by Import Surveillance; certificate provides additional information that better informs risk

5. Low risk cargo is released; CPSC/CBP designates high risk cargo for examination

* The term "Filer" is used generically to include anyone that may file data with CBP or CPSC (Broker/Filer/Importer)

Registry Concept

O Both *pre-filing* certificate data with CPSC through a registry and filing a complete package with CBP through the Automated Broker Interface (ABI) will be tested

O Pre-filed certificates will be linked back to the Entry through a certificate number and matched to all entries where the product certification is relevant

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Additional Notes on Pilot

O Certificate data elements fit within the ACE PGA Message Set architecture

O Web Services has been effectively running on CPSC systems for over 3 years

Projected Alpha Pilot Timeline

2015											2016					
Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun

Stakeholder Input

Project Preparation

Participant Recruiting & Onboarding

Pilot Definition and Development

Alpha Pilot LIVE

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Industry Participation

O CPSC is looking for companies to join the Commission in testing the initial concept

O Need to cover a broad set of products, modes of entry and business types

O GCC's and CPC's to be evaluated

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Alpha Pilot Goals

- ✓ Inform the 1110 Rulemaking

- ✓ Test the certificate data e-filing concept for Regulated Products
  - ✓ Full Certificate PGA Message Set
  - ✓ Reference Certificate PGA Message Set (with CPSC Certificate Registry)

- ✓ Identify and analyze the impact on industry, the government, and consumers
  - ✓ Advancing the "single" window environment
  - ✓ Impact on identification of noncompliant trade

Next Steps

O Stakeholder engagement:
  O COAC Webinars underway

O Recruit volunteers for the Pilot

O Develop technical requirements for alpha pilot
  O HTSUS mapping
  O CATAIR

Project Key Risks

O Industry participation

O CBP Dependency

O Industry participant's development time

Q & A

- www.cpsc.gov/cpc
- www.cpsc.gov/gcc
- www.cpsc.gov/certify
- www.cpsc.gov/en/Business--Manufacturing/Testing-Certification/
- www.cpsc.gov/testing (3rd party testing)

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Point of Contact

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